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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

In re:

HEIDI A. ELLIS

Debtor.

Case No: 10-30909-D-7
DCN: CJY-1

Chapter 7

Date: June 9, 2010
Time: 10:00 am
Place: 501 I Street, 6th Floor, Courtroom 34,
Sacramento, CA

**MOTION TO COMPEL CHAPTER 7 TRUSTEE
TO ABANDON PROPERTY OF THE ESTATE**

**TO THE HONORABLE ROBERT S. BARDWIL, RYAN LUCKSINGER/CHAPTER 7
TRUSTEE, AND ALL OTHER INTERESTED PARTIES:**

Heidi Ellis (“Debtor”) hereby moves this Court for an Order Granting Debtor’s MOTION TO COMPEL CHAPTER 7 TRUSTEE TO ABANDON PROPERTY OF THE ESTATE based upon the following grounds:

1. Debtor originally filed a Chapter 7 bankruptcy case, bearing the case number 10-30909-D-7 on April 27, 2010.
2. Debtor owns and operates a small tattoo business named “Pretty in Ink.” A true and correct copy of Schedule B of the Debtor’s Voluntary Petition is filed concurrently herewith as Exhibit “A” and incorporated herein by reference. This business has no marketable value outside the Debtor’s own efforts. This business is the Debtor’s main occupation at the present time. The Debtor has invested substantial resources, time, and energy into this business and,

1 because of the investment, wishes to keep operating at the present time. If the Debtor ceases
2 operations, even for a short time, she will surely lose clientele, making it impossible to reopen
3 and maintain its required expenses.

- 4 3. Debtor asks that the following assets be abandoned: the business name, "Pretty in Ink", the
5 business checking account with Chase Bank with an approximate balance of \$1,000.00,
6 \$8,000.00 in equipment comprised of 3 chairs, 6 tattoo machines, 1 copy machine, 1 stencil
7 machine, 1 ultrasonic, needles, 2 massage tables, and \$400 in inventory for inks, soaps.
- 8 4. The tattoo business listed herein and operated by the Debtor, including business checking
9 account, equipment, and inventory have a liquidation value of approximately \$9,400.00,
10 which is fully exempt under various sections of the California Code of Civil Procedure. A
11 true and correct copy of Schedule C of the Debtor's Voluntary Petition is filed concurrently
12 herewith as Exhibit "B" and incorporated herein by reference.
- 13 5. The equity in Property is exempted pursuant to C.C.P. Sections 703.140(b)(5) and
14 703.140(b)(6) as set forth in Debtor's Schedule C filed concurrently herewith in the List of
15 Exhibits.
- 16 6. As the Property is protected and exempted, it is of inconsequential value to the bankruptcy
17 estate, and there is nothing for the Trustee to administer to unsecured creditors.

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20 DATED: May 12, 2010

/s/ Christian J. Younger
Christian J. Younger
Attorney for Debtor